

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION ----- This document applies to:  ETHICON ELECTION WAVE CASES LISTED IN EXHIBIT A	Master File No. 2:12-MD-02327 MDL 2327  JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
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**NOTICE OF ADOPTION OF PRIOR *DAUBERT* MOTION TO EXCLUDE  
NEERAJ KOHLI, M.D. FOR ETHICON ELECTION WAVE**

Defendants hereby adopt and incorporate by reference the Wave 3 *Daubert* briefing filed regarding Neeraj Kohli, M.D. for Ethicon Election Wave, Case No. 2:12-md-02327, Dkt. 2806 (motion); Dkt. 2809 (memorandum in support); Dkt. 3023 (reply). Defendants respectfully request that the Court exclude Dr. Kohli's testimony, for the reasons expressed in the Ethicon Wave 3 briefing. This notice applies to the Ethicon Election Wave cases identified in Exhibit A.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
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